



POLICY: Social Tenant Access to Information Requirements (STAIRs)

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Social Tenant Access to Information Requirements (STAIRs) Policy

All reference to 'we', 'our' or 'us' in this Policy should be read as meaning Sandbourne Housing Association.

This policy aims to ensure that residents are able to access information from us. The policy sets out how we will promote access to information through a formal publication scheme enabling residents and residents' representatives to access information proactively, and to support residents to make information requests.

1. Purpose

This policy sets out how we will comply with the government's Policy Statement entitled the Social Tenant Access to Information Requirements, or "STAIRs", ensuring transparency, openness and tenant empowerment in being able to hold their landlord to account.

2. Scope

This policy applies to all our employees as a Private Registered Provider. STAIRs covers the publication of information, responding to information requests, and reviews and complaints.

3. Regulatory Framework

This policy is based on the Social Tenant Access to Information Requirements ("STAIRs") introduced under the amended Transparency, Influence and Accountability ("TI&A") Consumer Standard issued by the Regulator of Social Housing ("RSH").

The Ministry for Housing Communities and Local Government ("MHCLG") has issued a Direction to RSH requiring it to introduce a new Consumer Standard enabling tenants to access information held by Private Registered Providers ("PRPs"). Further to a consultation, RSH has issued an amended TI&A Standard under which PRPs are required to comply with the STAIRs Policy Statement, which sets out the requirements for PRPs to issue a Publication Scheme (Chapter 1), and secondly to respond to information requests from tenants and their representatives (Chapter 2).

STAIRs is designed to enable residents and their designated representatives to be able to access information which supports residents to know more about how their services are delivered, either through information disclosed as part of a formal publication scheme or by responding to specific requests for information from tenants.

Chapter 1 (requirement to introduce a Publication Scheme) takes effect from 1 October 2026. Chapter 2 (submission of Information Requests) takes effect from 1 April 2027.

4. Policy Principles

STAIRs takes a principles-based approach in line with the RSH Consumer Standards. Key principles include: transparency, openness, accountability and resident involvement in how their services are delivered.

Under the publication scheme within Chapter 1 of the Policy Statement providers must proactively publish information which they hold and which falls within one or more of the classes of information set out in appendix 1 of the publication scheme.

The Policy Statement does not provide a prescriptive list as to precisely which documents we are required to provide. Instead, providers retain flexibility as to what information they may provide if they take a proactive approach to publication. The emphasis of the Policy Statement is in favour of disclosure.

Chapter 2 of STAIRs sets out that residents (or their designated representatives) may make a request for relevant information to their provider. Relevant information is defined as information relating to the management of a registered provider's social housing.

Providers should proactively respond to requests within 30 days, unless there are reasonable grounds to withhold information, such as where the information amounts to a protected class of information under freedom of information or data protection (or other) laws or where the harm caused by the disclosure would outweigh the benefit in the provider disclosing the information.

Providers should provide information irrespective of the reasons for the request or how the information may be used following disclosure and should disregard any perceived adverse impact or negative publicity which may be caused by the disclosure. The government's intention to promote transparency and accountability under STAIRs means that PRPs should take a proactive approach to the publication of documents and consider that information ought to be published unless there is a good reason why information ought not to be published.

5. The Requirements

The STAIRs scheme has two key phases: Chapter 1 Publication Scheme; Chapter 2 Information Requests.

Key requirements for each phase are set out in sections (A) and (B) below. Information available under STAIRs is generally available free of charge. Where information is required in a non-electronic format, we ask that residents contact us to discuss their requirements. We are committed to ensuring that information is made available in a way that is as accessible as possible for all our residents.

A. Publication Scheme (Chapter 1)

A template for a Publication Scheme detailing (i) what classes of information will be published (ii) how that information will be published is set out in Annex 1 to this policy.

B. Information Requests (Chapter 2)

Our process for handling information requests is set out in Annex 2 to this policy.

We will maintain a log of all information requests and timelines for responding to requests for reporting and accountability purposes.

6. Out of scope / Withheld information

We are not required to create new information to comply with either the publication scheme or information requests. When considering whether the information should be published, we will consider if the information comes within the classes of information set out in annexe 1 of the Policy Statement. It may be necessary to redact documents prior to publication.

We have also included in Annexe 1 the categories of information which we think may be out of scope of STAIRs – please note that this is not an exhaustive list.

When considering an information request under Chapter 2 we will consider whether any information may need to be withheld or redacted in response to the request. Any withholding or redaction of information must be reasonable and in line with the principles set out in the Policy Statement.

Annexe 2 to this policy sets out how we will respond to requests for information and how we will consider “reasonableness” when assessing whether information should be withheld or redacted. If, on receipt of any response in relation to the request, the resident considers that information has been redacted or withheld without a reasonable basis for doing so, we refer you to our review process set out in section 7.

7. Review and Complaints Process

If the resident considers that we have not published information or responded to their request for information appropriately or they are otherwise dissatisfied with the handling of their request they can contact us to request a review.

A request for a review should generally be made within 3 months of receipt of the original decision. The purpose of any review will be to assess:

- i. how we have responded to the request for information (for example, where we may not have provided information in an accessible format);
- ii. where we have not published relevant information that we may hold and which the resident believes they may be entitled to;
- iii. where we have not complied with timelines for responding to a request and there is no good reason for us to have applied an extension;
- iv. where we have either withheld or redacted relevant information from disclosure and the resident disagrees with our decision and reasons for this.

We will carry out a review of how we have handled the request (an “internal review”) and aim to respond to the complaint within 30 calendar days of receipt. It may be necessary in exceptional circumstances to extend the timeline for a response – if this is necessary, we will let the resident know at the earliest opportunity. Any extension issued will be reasonable and kept to a minimum.

If a resident is not happy with our response to their review request, they can escalate their complaint directly to the Housing Ombudsman under the terms of the Housing Ombudsman Scheme.

Any complaint to the Ombudsman should generally be made within 3 months of the outcome of the review. Only matters relating to STAIRs (i.e. the publication of information under Chapter 1 or information requests under Chapter 2) can be addressed as part of a STAIRs review process and then by complaint to the Housing Ombudsman.

If the resident’s concern relates to an alleged breach of data protection legislation, they should inform us that the issue concerns a data protection complaint, which would then be dealt with via our usual complaints process for data protection matters.

8. Data Protection and Security

Data protection laws are directly applicable to housing providers. This means that where any information requested amounts to personal data or may not be identifiable personal data in isolation but could amount to identifiable personal data when combined with other information, this information may be withheld from disclosure in compliance with data protection laws.

Any requested information which amounts to personally identifiable data will not be disclosable under STAIRs but may be disclosed under data protection laws as a subject access request, where information is sought by the tenant about themselves. Where we consider that the request amounts to request for personal data, we will process the request in line with our Data Protection (GDPR) Policy.

9. Responsibilities

Overall responsibility for this policy lies with the Chief Executive; day to day implementation of this policy lies with the Head of Housing. All staff are required to familiarise themselves with the wording and obligations listed under this policy.

10. Monitoring and Review

This policy and the STAIRs scheme will be reviewed regularly to ensure accuracy and compliance. Audits of the scheme will be carried out as appropriate.

Publication Scheme

This Annexe sets out the basis on which we will proactively publish information relating to the management of our social housing function. We are committed to being open and transparent about the way we work, the services we provide and the decisions we make.

The information covered by this scheme is included in the classes of information set out in the table below where this information is held by us. The table sets out a non-exhaustive list of classes of information we routinely publish, how to access it, and any applicable charges. Much of the information is already freely available on our website.

We publish information within each class which is up to date and correct as at the date of publication and for the previous two financial years, unless stated otherwise. We have also included a table with proposed categories of out-of-scope information at the end of the publication scheme. This Scheme will be reviewed at least on an annual basis.

STAIRS - Publication scheme

CLASS OF INFORMATION	INFORMATION TYPICALLY INCLUDED
Governance and decision-making Information in this class is published as at the current date. Information relating to tenant consultations and meetings published for the current and previous two financial years	• About us [Documents setting out information relating to: Mission statement; vision and values; corporate objectives] • Our organisational structure [Documents containing our organisational structure charts identifying senior members of the organisation and key individuals – e.g. fire safety principal accountable person]. • Our board [Documents listing board members]. • Our committees [Documents listing our key decision-making committees and their executive functions]. • Our Executive Team [The senior management team with biographies]. • Our decision-making processes [Documents setting out our constitution and articles of association / standing orders / other organisational governing documents]. • Tenant consultation documents [e.g. newsletters; meeting agendas and minutes; our tenant participation strategy; resident engagement policies]. • Board papers [Documents listing a public version of our board papers, agendas and meeting minutes]. • Key documents relating to strategic decision making by the board [e.g. merger-related information highlighting strategic plan/rationale; impact assessments; due diligence considerations.]
Finance and spending Information in this class is published for the current and previous two financial years.	• Audited accounts and financial statements [Will contain details about spending, grants and use of service charge revenue]. • Rent collection; rent rates. • Procurement procedures relating to the acquisition of goods and services designated for the provision of housing management services. • Contracts and tenders that exceed £500 for housing management services. • Merger related transaction / integration costs (headline costs); financial risk assessments (as part of published plans).

Housing stock management	Corporate Plans and Objectives [Documents setting out our corporate strategy with a copy of the plans available for download, relating to the management of our housing stock and strategic goals for our organisation, including (not an exhaustive list): - • Decent homes. • Planned investment programme -building sustainable homes. • Estate management strategy. • Maintenance work and repairs • Environmental information and progress towards net zero. • Social investment strategy. - Resident engagement strategy]. • Stock profile and transfers [Details of any asset transfers (whether purchase or sale) in the last [12] months and any anticipated asset transfers within the next [12] month period]. • Property conditions and improvements to property [Details of maintenance and repairs works carried out over the last [12] months and response times]. • Stock/asset condition data (as required by RSH consumer standards) [Data required by RSH – home types; rent levels; tenant satisfaction metrics; lettings and sales; stock condition survey programmes; compliance]
Performance Information in this class is published for the current and previous two financial years	Inspections outcomes and ratings. [Any audits or reports from the Regulator of Social Housing, Housing Ombudsman decisions]. • Performance reviews and evaluation reports, internal/external audits. [Audits undertaken by internal teams and publishable external audits undertaken by consultants/professional services firms;]. • Tenant Satisfaction Measures/Annual reports to tenants. • Media releases. [Include links to news sections of our website and any charitable activities on behalf of the organisation]. • Complaints handling, procedures and performance metrics; service standards. [Include links to our reports regarding complaints handling and performance and any Housing Ombudsman Self-Assessments].

	• Information request / data breach data. [Include a copy of our disclosure log as updated (removing any personal identifiable data)]. • Health and safety performance and assessments. [To provide links to any organisational health and safety risk assessments to the extent these may be publishable without risk of harm to any individual]. • Number of evictions. [To include link to your reports on evictions and reasons for evictions without including any personally identifiable data]. • Compensation and redress. [Documents relating to internal outcomes for tenants and residents and Housing Ombudsman orders and other outcomes from legal claims]. • Awaab's law compliance – Reports on response times for emergency and significant hazards. [All reports on response times for dealing with emergency and significant hazards under Awaab's law]. • Number of decants over a [12] month period. [To publish information held relating to volume of decants to temporary alternative accommodation]
Housing services and tenant liaison Information in this class is published as at the current date.	Description of services, advice, and guidance for tenants. [To include links to all our documents providing advice and guidance to tenants and residents – these may vary from one organisation to another but will point to the link on our website where tenants can go to for any advice about their property and any tenant liaison groups and services].
Lists and registers Information in this class is published for the current and previous two financial years	Information held in registers required by law: • Gas safety registers. [Evidence of gas safety checks for properties but not at an individual level]. • Fire safety risk assessments (for communal and multi-occupied buildings). • Electrical safety (EICR) records. • Asbestos register (for communal areas of residential buildings). • Water hygiene logs / legionella risk assessments (inspection logs and risk assessments for hot/cold water systems).

	• Building safety performance documents and inspection outcomes. Other lists and registers relating to the management of social housing, e.g.: • Damp and mould case tracking reports (other than at a per property level). • Estate inspection schedules. • Home accessibility / adaptations register.
Social housing management	Policies and strategies relating to the management of social housing. This section should contain a full list of all our policies that impact on tenants' rights and duties. • Aids and adaptations. • Anti-social behaviour and adverse behaviours e.g. Domestic abuse policy; hate incidents. • Building safety. • Arrears. • Compensation. • Complaints / customer care. • Communal spaces. • Customer safeguarding. • Damp and mould. • Decant. • Disrepair. • Fire safety. • Fraud. • Income management. • Leasehold management. • Neighbourhood and estate management. • Pets. • Parking. • Rent. • Repairs and maintenance. • Moving and allocation (other than local authority allocation). • Shared ownership.

	• Service charges. • Succession. • Tenancy. • Water safety.
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SUGGESTED CATEGORIES OF OUT OF SCOPE INFORMATION	EXAMPLES OF TYPES OF INFORMATION (NOT AN EXHAUSTIVE LIST)
Internal business or commercial activities	• Contracts or agreements unrelated to the provision of housing management services (e.g. payroll services). • HR policies unrelated to social housing management (e.g. disciplinary policy). • Finance policies governing day to day business operations unrelated to the provision of housing management services. • Investment strategies relating to non-social or private housing. • Information which relates to internal discussions and the development of internal policy and strategy before board approval ("pipeline" information)
Matters decided by local authorities	• Housing allocations. • Homelessness assessments. • Housing benefit or council tax-related decisions. • Planning applications and planning enforcement actions.
Non-social housing management function	• Service charges for non-social housing. • Commercial lease management. • Repairs or safety data for market rent homes. • Private rented sector portfolios managed for profit.
Property that is not social housing	• Leasehold properties. • Shared ownership schemes where shared owner has staircased to own 100% of property equity. • Shops; offices; community centres. • Moorings, storage units or other non-residential lets. • Any build-to- rent or for-profit schemes held separately from the PRP
Wider activities unconnected with social housing	• Group level commercial ventures – e.g.: renewable energy subsidiaries; trading companies; joint ventures for private sale developments. • Care and support contracts delivered on behalf of local authorities (for care and support only). • Commercial investment or treasury activities

How will relevant information under STAIRs be published?

Information will be available on our website and will be regularly updated.

We are committed to making information listed in our Publication Scheme at appendix 1 available free of charge online. If information is required to be provided in an accessible alternative format, we also commit to providing a single copy of this information free of charge. However, where an individual requests additional copies of information, we may apply charges strictly to cover the actual costs incurred in providing additional copies.

Charges may apply for additional copies in the following circumstances:

- Printed or Hard Copy Documents
- Alternative Formats If information is requested in an alternative accessible format (e.g., large print, Braille, audio format), we will provide the information free of charge in the first instance.
- Additional copies may be chargeable.

There will be no charge for the Inspection of Information at our offices by appointment. Please contact us to arrange an appointment.

Resident Feedback on this Publication Scheme

Residents can provide suggestions for improvements to this Scheme via: info@sandbourne.org.uk.

Reviews

Should a resident consider that we have not included information in our publication scheme, or that we have unduly redacted information which they consider ought not to be redacted, they can request a review at info@sandbourne.org.uk. We will normally complete a review within 30 days.

Responding to Information Requests

Who can make requests?

We will respond to Information requests that are made either by a registered resident with us, or by their designated representative. We will only respond to requests where we can confirm the identity of the requesting resident and their representative (where appointed).

There are no restrictions on tenants as to whom they may choose as their representative. We will accept requests that are made in writing, including either by email or text message, provided that we can identify who the resident is. The request does not have to specifically mention "STAIRs" for it to be considered under the scheme, provided that the request is made in writing and we are able to identify the resident.

We recognise that certain residents may require additional support to make a request, and we will ensure that appropriate arrangements are in place to support all residents to be able to exercise their rights under STAIRs.

How long will it take us to respond?

We will provide an acknowledgement of receipt of the request within 3 working days of receipt. We will respond to the request within 30 calendar days from receipt of the request or, where the request requires clarification, 30 days from receipt of the clarification.

We will take reasonable steps to assist tenants and their representatives where any request requires clarification. In exceptional circumstances it may be necessary to extend the timeline for a response. Where this is necessary, we will inform the resident at the earliest opportunity. Every effort will be made to respond in a reasonable timeframe where any extension is required. If there is likely to be any delay in providing a response, we will ensure that we provide the resident with a reason for the delay together with our best estimate as to when they may be likely to receive a response.

Obtaining information from third parties.

It may be the case that the requested information is held by a third party responsible for the management of social housing on our behalf. If this is the case, we will use all reasonable endeavours to obtain the information, taking account of our duty to comply with the requirements, balanced against the need for a proportionate approach and the availability of resources.

We will keep logs of our contacts where it is necessary to reach out to third parties for the information.

Refusing to respond to Information Requests

We may refuse to respond to an information request where:

- It is reasonable to withhold the information from disclosure.
- Disclosure of the information may cause harm (where we have reasonably balanced the factors favouring disclosure against the likelihood of any harm arising from that disclosure).
- The identity of the resident (or that of their representative) cannot be established.
- The meaning of the request is not clear, and the resident has not responded to our reasonable efforts to seek clarification.
- The information requested is excluded on the basis that it is not relevant information (i.e. does not come within the scope of an information request under STAIRs).
- The work involved in responding to the request would exceed 18 hours of staff time.
- The request is excessive, in that it is repeated (including where we receive repeated requests from multiple tenants acting in coordination or seeking the same information).
- The request is offensive or communicated in an abusive manner or is clearly intended to otherwise cause disruption to our organisation. We may also redact information where it is appropriate and reasonable to do so.